

EXHIBIT A

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**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

ANDY KIM, in his personal capacity
as a candidate for U.S. Senate, et al.,

Plaintiffs,

v.

CHRISTINE GIORDANO HANLON,
in her official capacity as Monmouth
County Clerk, et al.,

Defendants.

Case No.: 3:24-cv-01098-ZNQ-TJB

**ANSWER TO VERIFIED
COMPLAINT WITH
AFFIRMATIVE DEFENSES**

Intervenor Defendant, Camden County Democratic Committee (“CCDC” or “Intervening Defendant”), hereby responds to Plaintiffs, Andy Kim, Andy Kim for New Jersey, Sarah Schoengood, Sarah for New Jersey, Carolyn Rush, and Carolyn Rush for Congress’s (collectively, “Plaintiffs”), Verified Complaint as follows:

NATURE OF THE CASE

1. The allegations of this paragraph are not directed at Intervening Defendant and, therefore, no response is required. To the extent a response is required, the allegations are denied.
2. The allegations of this paragraph are not directed at Intervening Defendant and, therefore, no response is required. To the extent a response is required, the allegations are denied.
3. The allegations of this paragraph are not directed at Intervening Defendant and, therefore, no response is required. To the extent a response is required, the allegations are denied.
4. The allegations of this paragraph are not directed at Intervening Defendant and, therefore, no response is required. To the extent a response is required, the allegations are denied.
5. The allegations of this paragraph are not directed at Intervening Defendant and, therefore, no response is required. To the extent a response is required, Intervening Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in this paragraph and, accordingly, deny same.

6. The allegations of this paragraph are not directed at Intervening Defendant and contain conclusions of law to which no response is required. To the extent a response is required, the allegations are denied.
7. The allegations of this paragraph are not directed at Intervening Defendant and contain conclusions of law to which no response is required. To the extent a response is required, the allegations are denied.
8. The allegations of this paragraph are not directed at Intervening Defendant and contain conclusions of law to which no response is required. To the extent a response is required, the allegations are denied.
9. The allegations of this paragraph are not directed at Intervening Defendant and, therefore, no response is required. To the extent a response is required, Intervening Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in this paragraph and, accordingly, deny same. By way of further response, the referenced article speaks for itself. Any characterization by Plaintiffs is denied.
10. The allegations of this paragraph are not directed at Intervening Defendant and contain conclusions of law to which no response is required. To the extent a response is required, the allegations are denied.

11.The allegations of this paragraph are not directed at Intervening Defendant and contain conclusions of law to which no response is required. To the extent a response is required, the allegations are denied.

12.The allegations of this paragraph are not directed at Intervening Defendant and contain conclusions of law to which no response is required. To the extent a response is required, the allegations are denied.

13.The allegations of this paragraph are not directed at Intervening Defendant and, therefore, no response is required. To the extent a response is required, Intervening Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in this paragraph and, accordingly, deny same.

14.The allegations of this paragraph are not directed at Intervening Defendant and, therefore, no response is required. To the extent a response is required, the allegations are denied.

15.The allegations of this paragraph are not directed at Intervening Defendant and, therefore, no response is required. To the extent a response is required, the allegations are denied.

16.The allegations of this paragraph are not directed at Intervening Defendant and contain conclusions of law to which no response is required. To the extent a response is required, the allegations are denied.

17.The allegations of this paragraph are not directed at Intervening Defendant and contain conclusions of law to which no response is required. To the extent a response is required, the allegations are denied.

18.The allegations of this paragraph are not directed at Intervening Defendant and contain conclusions of law to which no response is required. To the extent a response is required, the allegations are denied.

JURISDICTION AND VENUE

19.Admitted in part and denied in part. Admitted only that Plaintiffs bring this action under 42 U.S.C. §§ 1983 and 1988. The remaining allegations of this paragraph contain conclusions of law to which no response is required. To the extent a response is required, the allegations are denied.

20.The allegations of this paragraph are not directed at Intervening Defendant and contain conclusions of law to which no response is required. To the extent a response is required, the allegations are denied.

21.The allegations of this paragraph are not directed at Intervening Defendant and contain conclusions of law to which no response is required. To the extent a response is required, the allegations are denied.

22.The allegations of this paragraph are not directed at Intervening Defendant and contain conclusions of law to which no response is required. To the extent a response is required, the allegations are denied.

23.The allegations of this paragraph are not directed at Intervening Defendant and contain conclusions of law to which no response is required. To the extent a response is required, the allegations are denied.

PARTIES
Plaintiffs

Andy Kim: U.S. Senate Candidate in Upcoming Primary Election¹

24.The allegations of this paragraph are not directed at Intervening Defendant and, therefore, no response is required. To the extent a response is required, Intervening Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in this paragraph and, accordingly, deny same.

25.The allegations of this paragraph are not directed at Intervening Defendant and, therefore, no response is required. To the extent a response is required, Intervening Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in this paragraph and, accordingly deny same.

¹ All descriptive headings set forth throughout Plaintiffs' Verified Complaint are included herein for consistency with Plaintiffs' pleading and for purposes of reference only. Recitation of such headings is not and shall not be construed as an adoption or admission by the Intervening Defendant. The statements in the heading(s) are specifically denied.

Sarah Schoengood: U.S. House of Representatives (CD-3)
Candidate in Upcoming Primary Election²

28. The allegations of this paragraph are not directed at Intervening Defendant and, therefore, no response is required. To the extent a response is required, Intervening Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in this paragraph and, accordingly, deny same.

29. The allegations of this paragraph are not directed at Intervening Defendant and, therefore, no response is required. To the extent a response is required, Intervening Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in this paragraph and, accordingly, deny same.

Carolyn Rush: U.S. House of Representatives (CD-2)
Candidate in Upcoming Primary Election

26. The allegations of this paragraph are not directed at Intervening Defendant and, therefore, no response is required. To the extent a response is required, Intervening Defendant is without knowledge or information sufficient to form

² There is a typographical error in the numbering of the paragraphs in the Verified Complaint. For clarity and to avoid confusion, the paragraphs of Intervening Defendant's Answer will be numbered in accordance with the paragraphs set forth in the Verified Complaint.

a belief as to the truth of the allegations contained in this paragraph and, accordingly, deny same.

27. The allegations of this paragraph are not directed at Intervening Defendant and, therefore, no response is required. To the extent a response is required, Intervening Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in this paragraph and, accordingly, deny same.

Defendants

28. The allegations of this paragraph are not directed at Intervening Defendant and contain conclusions of law to which no response is required. To the extent a response is required, the allegations are denied.

29. The allegations of this paragraph are not directed at Intervening Defendant and contain conclusions of law to which no response is required. To the extent a response is required, the allegations are denied.

30. The allegations of this paragraph are not directed at Intervening Defendant and contain conclusions of law to which no response is required. To the extent a response is required, the allegations are denied.

31. The allegations of this paragraph are not directed at Intervening Defendant and contain conclusions of law to which no response is required. To the extent a response is required, the allegations are denied.

32.The allegations of this paragraph are not directed at Intervening Defendant and contain conclusions of law to which no response is required. To the extent a response is required, the allegations are denied.

33.The allegations of this paragraph are not directed at Intervening Defendant and contain conclusions of law to which no response is required. To the extent a response is required, the allegations are denied.

34.The allegations of this paragraph are not directed at Intervening Defendant and contain conclusions of law to which no response is required. To the extent a response is required, the allegations are denied.

35.The allegations of this paragraph are not directed at Intervening Defendant and contain conclusions of law to which no response is required. To the extent a response is required, the allegations are denied.

36.The allegations of this paragraph are not directed at Intervening Defendant and contain conclusions of law to which no response is required. To the extent a response is required, the allegations are denied.

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45.The allegations of this paragraph are not directed at Intervening Defendant and contain conclusions of law to which no response is required. To the extent a response is required, the allegations are denied.

46.The allegations of this paragraph are not directed at Intervening Defendant and contain conclusions of law to which no response is required. To the extent a response is required, the allegations are denied.

47.The allegations of this paragraph are not directed at Intervening Defendant and contain conclusions of law to which no response is required. To the extent a response is required, the allegations are denied.

Interested Parties

48.The allegations of this paragraph are not directed at Intervening Defendant and contain conclusions of law to which no response is required. To the extent a response is required, the allegations are denied.

49.The allegations of this paragraph are not directed at Intervening Defendant and contain conclusions of law to which no response is required. To the extent a response is required, the allegations are denied.

50.The allegations of this paragraph are not directed at Intervening Defendant and contain conclusions of law to which no response is required. To the extent a response is required, the allegations are denied.

51.The allegations of this paragraph are not directed at Intervening Defendant and, therefore, no response is required. To the extent a response is required, the allegations are denied.

52.The allegations of this paragraph are not directed at Intervening Defendant and, therefore, no response is required. To the extent a response is required, the allegations are denied.

STATEMENT OF FACTS AND LAW

A. Basic Ballot Layout

53.The allegations of this paragraph are not directed at Intervening Defendant and, therefore, no response is required. To the extent a response is required, Intervening Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in this paragraph and, accordingly, deny same.

54.The allegations of this paragraph are not directed at Intervening Defendant and, therefore, no response is required. To the extent a response is required, Intervening Defendant is without knowledge of information sufficient to form

a belief as to the truth of the allegations contained in this paragraph and, accordingly, deny same.

55.The allegations of this paragraph are not directed at Intervening Defendant and, therefore, no response is required. To the extent a response is required, Intervening Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in this paragraph and, accordingly, deny same.

B. Pivot Point

56.The allegations of this paragraph are not directed at Intervening Defendant and, therefore, no response is required. To the extent a response is required, Intervening Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in this paragraph and, accordingly, deny same.

57.The allegations of this paragraph are not directed at Intervening Defendant and, therefore, no response is required. To the extent a response is required, Intervening Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in this paragraph and, accordingly, deny same.

58.The allegations of this paragraph are not directed at Intervening Defendant and, therefore, no response is required. To the extent a response is required,

Intervening Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in this paragraph and, accordingly, deny same.

59. The allegations of this paragraph are not directed at Intervening Defendant and, therefore, no response is required. To the extent a response is required, Intervening Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in this paragraph and, accordingly, deny same.

C. Bracketing

60. The allegations of this paragraph are not directed at Intervening Defendant and contain conclusions of law to which no response is required. To the extent a response is required, the allegations are denied. By way of further response, the referenced statute speaks for itself. Any characterization by Plaintiffs is denied.

61. The allegations of this paragraph are not directed at Intervening Defendant and contain conclusions of law to which no response is required. To the extent a response is required, the allegations are denied. By way of further response, the referenced statute speaks for itself. Any characterization by Plaintiffs is denied.

62.The allegations of this paragraph are not directed at Intervening Defendant and contain conclusions of law to which no response is required. To the extent a response is required, the allegations are denied. By way of further response, the referenced statute speaks for itself. Any characterization by Plaintiffs is denied.

D. Ballot Position

63.The allegations of this paragraph are not directed at Intervening Defendant and contain conclusions of law to which no response is required. To the extent a response is required, the allegations are denied. By way of further response, the referenced statute speaks for itself. Any characterization by Plaintiffs is denied.

64.The allegations of this paragraph are not directed at Intervening Defendant and contain conclusions of law to which no response is required. To the extent a response is required, the allegations are denied. By way of further response, the referenced statute speaks for itself. Any characterization by Plaintiffs is denied.

65.The allegations of this paragraph are not directed at Intervening Defendant and contain conclusions of law to which no response is required. To the extent a response is required, the allegations are denied. By way of further response,

the referenced statute speaks for itself. Any characterization by Plaintiffs is denied.

66.The allegations of this paragraph are not directed at Intervening Defendant and contain conclusions of law to which no response is required. To the extent a response is required, the allegations are denied. By way of further response, the referenced statute speaks for itself. Any characterization by Plaintiffs is denied.

67.The allegations of this paragraph are not directed at Intervening Defendant and contain conclusions of law to which no response is required. To the extent a response is required, the allegations are denied.

68.The allegations of this paragraph are not directed at Intervening Defendant and contain conclusions of law to which no response is required. To the extent a response is required, the allegations are denied.

E. United States Senate and Gubernatorial Candidates

69.The allegations of this paragraph are not directed at Intervening Defendant and contain conclusions of law to which no response is required. To the extent a response is required, the allegations are denied. By way of further response, the referenced statute speaks for itself. Any characterization by Plaintiffs is denied.

70.The allegations of this paragraph are not directed at Intervening Defendant and contain conclusions of law to which no response is required. To the extent a response is required, the allegations are denied.

71.The allegations of this paragraph are not directed at Intervening Defendant and contain conclusions of law to which no response is required. To the extent a response is required, the allegations are denied.

72.The allegations of this paragraph are not directed at Intervening Defendant and, therefore, no response is required. To the extent a response is required, Intervening Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in this paragraph and, accordingly, deny same.

F. Arbitrary Criteria for Ballot Advantage and Varying Standards of County Clerks

73.The allegations of this paragraph are not directed at Intervening Defendant and contain conclusions of law to which no response is required. To the extent a response is required, the allegations are denied.

74.The allegations of this paragraph are not directed at Intervening Defendant and contain conclusions of law to which no response is required. To the extent a response is required, the allegations are denied.

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G. Primacy Effect, Weight of the Line, and Other Ballot Placement Advantages and Disadvantages

77. The allegations of this paragraph are not directed at Intervening Defendant and, therefore, no response is required. To the extent a response is required, Intervening Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in this paragraph and, accordingly, deny same.

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87.The allegations of this paragraph are not directed at Intervening Defendant and contain conclusions of law to which no response is required. To the extent a response is required, the allegations are denied.

H. Candidate Ballot Placement in 2020 Democratic Primary Election

88.The allegations of this paragraph are not directed at Intervening Defendant and, therefore, no response is required. To the extent a response is required, the allegations are denied.

89.The allegations of this paragraph are not directed at Intervening Defendant and, therefore, no response is required. To the extent a response is required, the allegations are denied. By way of further response, the referenced document speaks for itself. Any characterization by Plaintiffs is denied.

90.The allegations of this paragraph are not directed at Intervening Defendant and, therefore, no response is required. To the extent a response is required,

the allegations are denied. By way of further response, the referenced document speaks for itself. Any characterization by Plaintiffs is denied.

91.The allegations of this paragraph are not directed at Intervening Defendant and, therefore, no response is required. To the extent a response is required, Intervening Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in this paragraph and, accordingly, deny same.

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93.The allegations of this paragraph are not directed at Intervening Defendant and, therefore, no response is required. To the extent a response is required, Intervening Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in this paragraph and, accordingly, deny same.

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101. The allegations of this paragraph are not directed at Intervening Defendant and contain conclusions of law to which no response is required. To the extent a response is required, the allegations are denied.

102. The allegations of this paragraph are not directed at Intervening Defendant and contain conclusions of law to which no response is required. To the extent a response is required, the allegations are denied.

I. Expert Findings

103. The allegations of this paragraph are not directed at Intervening Defendant and contain conclusions of law to which no response is required. To the extent a response is required, Intervening Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in this paragraph and, accordingly, deny same. By way of further response, the referenced documents speak for themselves. Any characterization by Plaintiffs is denied.

104. The allegations of this paragraph are not directed at Intervening Defendant and contain conclusions of law to which no response is required. To the extent a response is required, Intervening Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in this paragraph and, accordingly, deny same. By way of further response, the referenced documents speak for themselves. Any characterization by Plaintiffs is denied.

Dr. Rubin and Dr. Wang Expert Reports (Exhibits C and D)

105. The allegations of this paragraph are not directed at Intervening Defendant and contain conclusions of law to which no response is required. To the extent a response is required, Intervening Defendant is without knowledge or information sufficient to form a belief as to the truth of the

allegations contained in this paragraph and, accordingly, deny same. By way of further response, the referenced documents speak for themselves. Any characterization by Plaintiffs is denied.

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Dr. Pasek Expert Report (Exhibit B)

112. The allegations of this paragraph are not directed at Intervening Defendant and contain conclusions of law to which no response is required. To the extent a response is required, Intervening Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in this paragraph and, accordingly, deny same. By way of further response, the referenced documents speak for themselves. Any characterization by Plaintiffs is denied.

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122. The allegations of this paragraph are not directed at Intervening Defendant and contain conclusions of law to which no response is required. To the extent a response is required, Intervening Defendant is without

knowledge or information sufficient to form a belief as to the truth of the allegations contained in this paragraph and, accordingly, deny same. By way of further response, the referenced documents speak for themselves. Any characterization by Plaintiffs is denied.

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To the extent a response is required, Intervening Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in this paragraph and, accordingly, deny same. By way of further response, the referenced documents speak for themselves. Any characterization by Plaintiffs is denied.

126. The allegations of this paragraph are not directed at Intervening Defendant and contain conclusions of law to which no response is required. To the extent a response is required, Intervening Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in this paragraph and, accordingly, deny same. By way of further response, the referenced documents speak for themselves. Any characterization by Plaintiffs is denied.

127. The allegations of this paragraph are not directed at Intervening Defendant and contain conclusions of law to which no response is required. To the extent a response is required, Intervening Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in this paragraph and, accordingly, deny same. By way of further response, the referenced documents speak for themselves. Any characterization by Plaintiffs is denied.

Dr. Appel Expert Report (Exhibit E)

128. The allegations of this paragraph are not directed at Intervening Defendant and contain conclusions of law to which no response is required. To the extent a response is required, Intervening Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in this paragraph and, accordingly, deny same. By way of further response, the referenced documents speak for themselves. Any characterization by Plaintiffs is denied.

129. The allegations of this paragraph are not directed at Intervening Defendant and contain conclusions of law to which no response is required. To the extent a response is required, Intervening Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in this paragraph and, accordingly, deny same. By way of further response, the referenced documents speak for themselves. Any characterization by Plaintiffs is denied.

130. The allegations of this paragraph are not directed at Intervening Defendant and contain conclusions of law to which no response is required. To the extent a response is required, Intervening Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in this paragraph and, accordingly, deny same. By way

of further response, the referenced documents speak for themselves. Any characterization by Plaintiffs is denied.

131. The allegations of this paragraph are not directed at Intervening Defendant and contain conclusions of law to which no response is required. To the extent a response is required, Intervening Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in this paragraph and, accordingly, deny same. By way of further response, the referenced documents speak for themselves. Any characterization by Plaintiffs is denied.

132. The allegations of this paragraph are not directed at Intervening Defendant and contain conclusions of law to which no response is required. To the extent a response is required, Intervening Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in this paragraph and, accordingly, deny same. By way of further response, the referenced documents speak for themselves. Any characterization by Plaintiffs is denied.

133. The allegations of this paragraph are not directed at Intervening Defendant and contain conclusions of law to which no response is required. To the extent a response is required, Intervening Defendant is without knowledge or information sufficient to form a belief as to the truth of the

allegations contained in this paragraph and, accordingly, deny same. By way of further response, the referenced documents speak for themselves. Any characterization by Plaintiffs is denied.

J. Ballot Placement for Plaintiff Candidates in the Upcoming Primary Election

134. The allegations of this paragraph are not directed at Intervening Defendant and contain conclusions of law to which no response is required. To the extent a response is required, the allegations are denied.

Andy Kim: June 4, 2024 Democratic Primary Election for United States Senator

135. The allegations of this paragraph are not directed at Intervening Defendant and, therefore, no response is required. To the extent a response is required, Intervening Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in this paragraph and, accordingly, deny same.

136. The allegations of this paragraph are not directed at Intervening Defendant and, therefore, no response is required. To the extent a response is required, Intervening Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in this paragraph and, accordingly, deny same.

137. The allegations of this paragraph are not directed at Intervening Defendant and, therefore, no response is required. To the extent a response is

required, Intervening Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in this paragraph and, accordingly, deny same.

138. The allegations of this paragraph are not directed at Intervening Defendant and, therefore, no response is required. To the extent a response is required, Intervening Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in this paragraph and, accordingly, deny same.

139. The allegations of this paragraph are not directed at Intervening Defendant and, therefore, no response is required. To the extent a response is required, Intervening Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in this paragraph and, accordingly, deny same.

140. The allegations of this paragraph are not directed at Intervening Defendant and, therefore, no response is required. To the extent a response is required, Intervening Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in this paragraph and, accordingly, deny same.

141. The allegations of this paragraph are not directed at Intervening Defendant and, therefore, no response is required. To the extent a response is

required, Intervening Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in this paragraph and, accordingly, deny same.

142. The allegations of this paragraph are not directed at Intervening Defendant and, therefore, no response is required. To the extent a response is required, Intervening Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in this paragraph and, accordingly, deny same.

143. The allegations of this paragraph are not directed at Intervening Defendant and, therefore, no response is required. To the extent a response is required, Intervening Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in this paragraph and, accordingly, deny same.

144. The allegations of this paragraph are not directed at Intervening Defendant and, therefore, no response is required. To the extent a response is required, Intervening Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in this paragraph and, accordingly, deny same.

145. The allegations of this paragraph are not directed at Intervening Defendant and, therefore, no response is required. To the extent a response is

required, Intervening Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in this paragraph and, accordingly, deny same.

146. The allegations of this paragraph are not directed at Intervening Defendant and contain conclusions of law to which no response is required. To the extent a response is required, Intervening Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in this paragraph and, accordingly, deny same.

147. The allegations of this paragraph are not directed at Intervening Defendant and contain conclusions of law to which no response is required. To the extent a response is required, Intervening Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in this paragraph and, accordingly, deny same.

148. The allegations of this paragraph are not directed at Intervening Defendant and contain conclusions of law to which no response is required. To the extent a response is required, Intervening Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in this paragraph and, accordingly, deny same.

149. The allegations of this paragraph are not directed at Intervening Defendant and contain conclusions of law to which no response is required.

To the extent a response is required, Intervening Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in this paragraph and, accordingly, deny same.

150. The allegations of this paragraph are not directed at Intervening Defendant and contain conclusions of law to which no response is required. To the extent a response is required, Intervening Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in this paragraph and, accordingly, deny same.

Sarah Schoengood: June 4, 2024 Democratic Primary Election for
House of Representatives (CD-3)

151. The allegations of this paragraph are not directed at Intervening Defendant and, therefore, no response is required. To the extent a response is required, Intervening Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in this paragraph and, accordingly, deny same.

152. The allegations of this paragraph are not directed at Intervening Defendant and contain conclusions of law to which no response is required. To the extent a response is required, Intervening Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in this paragraph and, accordingly, deny same.

153. The allegations of this paragraph are not directed at Intervening Defendant and contain conclusions of law to which no response is required. To the extent a response is required, Intervening Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in this paragraph and, accordingly, deny same.

154. The allegations of this paragraph are not directed at Intervening Defendant and contain conclusions of law to which no response is required. To the extent a response is required, Intervening Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in this paragraph and, accordingly, deny same.

155. The allegations of this paragraph are not directed at Intervening Defendant and contain conclusions of law to which no response is required. To the extent a response is required, Intervening Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in this paragraph and, accordingly, deny same.

156. The allegations of this paragraph are not directed at Intervening Defendant and contain conclusions of law to which no response is required. To the extent a response is required, Intervening Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in this paragraph and, accordingly, deny same.

157. The allegations of this paragraph are not directed at Intervening Defendant and contain conclusions of law to which no response is required. To the extent a response is required, Intervening Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in this paragraph and, accordingly, deny same.

Carolyn Rush: June 4, 2024 Democratic Primary Election for House of Representatives (CD-2)

158. The allegations of this paragraph are not directed at Intervening Defendant and, therefore, no response is required. To the extent a response is required, Intervening Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in this paragraph and, accordingly, deny same.

159. The allegations of this paragraph are not directed at Intervening Defendant and, therefore, no response is required. To the extent a response is required, Intervening Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in this paragraph and, accordingly, deny same.

160. The allegations of this paragraph are not directed at Intervening Defendant and, therefore, no response is required. To the extent a response is required, Intervening Defendant is without knowledge or information

sufficient to form a belief as to the truth of the allegations contained in this paragraph and, accordingly, deny same.

161. The allegations of this paragraph are not directed at Intervening Defendant and, therefore, no response is required. To the extent a response is required, Intervening Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in this paragraph and, accordingly, deny same.

162. The allegations of this paragraph are not directed at Intervening Defendant and contain conclusions of law to which no response is required. To the extent a response is required, Intervening Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in this paragraph and, accordingly, deny same.

163. The allegations of this paragraph are not directed at Intervening Defendant and contain conclusions of law to which no response is required. To the extent a response is required, Intervening Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in this paragraph and, accordingly, deny same.

K. Pertinent Election Calendar for the Upcoming Primary Election

164. The allegations of this paragraph are not directed at Intervening Defendant and, therefore, no response is required. To the extent a response is required, admitted.

165. The allegations of this paragraph are not directed at Intervening Defendant and contain conclusions of law to which no response is required. To the extent a response is required, admitted.

166. The allegations of this paragraph are not directed at Intervening Defendant and contain conclusions of law to which no response is required. To the extent a response is required, the allegations are denied.

167. The allegations of this paragraph are not directed at Intervening Defendant contain conclusions of law to which no response is required. To the extent a response is required, Intervening Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in this paragraph and, accordingly, deny same.

CLAIMS FOR RELIEF

COUNT I

**U.S. Const. Amend. I and XIV, 42 U.S.C. § 1983
Violation of Plaintiffs' First and Fourteenth Amendment Rights Under
Federal Constitution (Right to Vote)**

168. Intervening Defendant incorporates by reference the preceding paragraphs as if set forth fully herein.

169. The allegations of this paragraph contain conclusions of law to which no response is required. To the extent a response is required, the allegations are denied.

170. The allegations of this paragraph contain conclusions of law to which no response is required. To the extent a response is required, the allegations are denied.

171. The allegations of this paragraph contain conclusions of law to which no response is required. To the extent a response is required, the allegations are denied.

172. The allegations of this paragraph contain conclusions of law to which no response is required. To the extent a response is required, the allegations are denied.

173. The allegations of this paragraph contain conclusions of law to which no response is required. To the extent a response is required, the allegations are denied.

174. The allegations of this paragraph contain conclusions of law to which no response is required. To the extent a response is required, the allegations are denied.

175. The allegations of this paragraph contain conclusions of law to which no response is required. To the extent a response is required, the allegations are denied.

176. The allegations of this paragraph contain conclusions of law to which no response is required. To the extent a response is required, the allegations are denied.

177. The allegations of this paragraph contain conclusions of law to which no response is required. To the extent a response is required, the allegations are denied.

178. The allegations of this paragraph contain conclusions of law to which no response is required. To the extent a response is required, the allegations are denied.

179. The allegations of this paragraph contain conclusions of law to which no response is required. To the extent a response is required, the allegations are denied.

180. The allegations of this paragraph contain conclusions of law to which no response is required. To the extent a response is required, the allegations are denied.

181. The allegations of this paragraph contain conclusions of law to which no response is required. To the extent a response is required, the allegations are denied.

182. The allegations of this paragraph contain conclusions of law to which no response is required. To the extent a response is required, the allegations are denied.

183. The allegations of this paragraph contain conclusions of law to which no response is required. To the extent a response is required, the allegations are denied.

WHEREFORE, Intervening Defendant Camden County Democratic Committee hereby demands judgment dismissing Plaintiffs' Verified Complaint in its entirety and further awarding costs, attorneys' fees, and such other relief as deemed appropriate by the Court.

COUNT II
U.S. Const. Amend. I and XIV, 42 U.S.C. § 1983
Violation of Plaintiffs' First and Fourteenth Amendment Rights Under
Federal Constitution (Equal Protection)

184. Intervening Defendant incorporates by reference the preceding paragraphs as if set forth fully herein.

185. The allegations of this paragraph contain conclusions of law to which no response is required. To the extent a response is required, the allegations are denied.

186. The allegations of this paragraph contain conclusions of law to which no response is required. To the extent a response is required, the allegations are denied.

187. The allegations of this paragraph contain conclusions of law to which no response is required. To the extent a response is required, the allegations are denied.

188. The allegations of this paragraph contain conclusions of law to which no response is required. To the extent a response is required, the allegations are denied.

189. The allegations of this paragraph contain conclusions of law to which no response is required. To the extent a response is required, the allegations are denied.

190. The allegations of this paragraph contain conclusions of law to which no response is required. To the extent a response is required, the allegations are denied.

191. The allegations of this paragraph contain conclusions of law to which no response is required. To the extent a response is required, the allegations are denied.

192. The allegations of this paragraph contain conclusions of law to which no response is required. To the extent a response is required, the allegations are denied.

193. The allegations of this paragraph contain conclusions of law to which no response is required. To the extent a response is required, the allegations are denied.

194. The allegations of this paragraph contain conclusions of law to which no response is required. To the extent a response is required, the allegations are denied.

195. The allegations of this paragraph contain conclusions of law to which no response is required. To the extent a response is required, the allegations are denied.

196. The allegations of this paragraph contain conclusions of law to which no response is required. To the extent a response is required, the allegations are denied.

197. The allegations of this paragraph contain conclusions of law to which no response is required. To the extent a response is required, the allegations are denied.

198. The allegations of this paragraph contain conclusions of law to which no response is required. To the extent a response is required, the allegations are denied.

199. The allegations of this paragraph contain conclusions of law to which no response is required. To the extent a response is required, the allegations are denied.

WHEREFORE, Intervening Defendant Camden County Democratic Committee hereby demands judgment dismissing Plaintiffs' Verified Complaint in its entirety and further awarding costs, attorneys' fees, and such other relief as deemed appropriate by the Court.

COUNT III
U.S. Const. Amend. I and XIV, 42 U.S.C. § 1983
Violation of Plaintiffs' First and Fourteenth Amendment Rights Under
Federal Constitution (Freedom of Association)

200. Intervening Defendant incorporates by reference the preceding paragraphs as if set forth fully herein.

201. The allegations of this paragraph contain conclusions of law to which no response is required. To the extent a response is required, the allegations are denied.

202. The allegations of this paragraph contain conclusions of law to which no response is required. To the extent a response is required, the allegations are denied.

203. The allegations of this paragraph contain conclusions of law to which no response is required. To the extent a response is required, the allegations are denied.

204. The allegations of this paragraph contain conclusions of law to which no response is required. To the extent a response is required, the allegations are denied.

205. The allegations of this paragraph are not directed at Intervening Defendant and contain conclusions of law to which no response is required. To the extent a response is required, Intervening Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in this paragraph and, accordingly, deny same.

206. The allegations of this paragraph contain conclusions of law to which no response is required. To the extent a response is required, the allegations are denied.

207. The allegations of this paragraph contain conclusions of law to which no response is required. To the extent a response is required, the allegations are denied.

208. The allegations of this paragraph contain conclusions of law to which no response is required. To the extent a response is required, the allegations are denied.

209. The allegations of this paragraph contain conclusions of law to which no response is required. To the extent a response is required, the allegations are denied.

210. The allegations of this paragraph contain conclusions of law to which no response is required. To the extent a response is required, the allegations are denied.

211. The allegations of this paragraph contain conclusions of law to which no response is required. To the extent a response is required, the allegations are denied.

212. The allegations of this paragraph contain conclusions of law to which no response is required. To the extent a response is required, the allegations are denied.

WHEREFORE, Intervening Defendant Camden County Democratic Committee hereby demands judgment dismissing Plaintiffs' Verified Complaint in its entirety and further awarding costs, attorneys' fees, and such other relief as deemed appropriate by the Court.

COUNT IV
U.S. Const. Art. I, § 4, cl. 1, 42 U.S.C § 1983
Violation of Elections Clause Under Federal Constitution

213. Intervening Defendant incorporates by reference the preceding paragraphs as if set forth fully herein.

214. The allegations of this paragraph contain conclusions of law to which no response is required. To the extent a response is required, the allegations are denied.

215. The allegations of this paragraph contain conclusions of law to which no response is required. To the extent a response is required, the allegations are denied.

216. The allegations of this paragraph contain conclusions of law to which no response is required. To the extent a response is required, the allegations are denied.

217. The allegations of this paragraph contain conclusions of law to which no response is required. To the extent a response is required, the allegations are denied.

218. The allegations of this paragraph contain conclusions of law to which no response is required. To the extent a response is required, the allegations are denied.

219. The allegations of this paragraph contain conclusions of law to which no response is required. To the extent a response is required, the allegations are denied.

220. The allegations of this paragraph contain conclusions of law to which no response is required. To the extent a response is required, the allegations are denied.

221. The allegations of this paragraph contain conclusions of law to which no response is required. To the extent a response is required, the allegations are denied.

222. The allegations of this paragraph contain conclusions of law to which no response is required. To the extent a response is required, the allegations are denied.

223. The allegations of this paragraph contain conclusions of law to which no response is required. To the extent a response is required, the allegations are denied.

224. The allegations of this paragraph contain conclusions of law to which no response is required. To the extent a response is required, the allegations are denied.

225. The allegations of this paragraph contain conclusions of law to which no response is required. To the extent a response is required, the allegations are denied.

226. The allegations of this paragraph contain conclusions of law to which no response is required. To the extent a response is required, the allegations are denied.

227. The allegations of this paragraph contain conclusions of law to which no response is required. To the extent a response is required, the allegations are denied.

WHEREFORE, Intervening Defendant Camden County Democratic Committee hereby demands judgment dismissing Plaintiffs' Verified Complaint in its entirety and further awarding costs, attorneys' fees, and such other relief as deemed appropriate by the Court.

SEPARATE AND AFFIRMATIVE DEFENSES

1. Plaintiffs fail to state a claim upon which relief can be granted.
2. Plaintiffs' claims are barred by the doctrines of laches, estoppel, fraud, unclean hands, and/or waiver.
3. Plaintiffs' claims are barred by the statute(s) of limitations and/or failure to exhaust administrative remedies.
4. Plaintiffs have not been deprived of any right, privilege, or immunity secured to them by the United States Constitution or any Act of Congress.
5. This Court lacks subject matter jurisdiction over some or all of the claims alleged herein.

6. Plaintiffs' claims are barred by res judicata, and/or collateral estoppel, and/or the entire controversy doctrine.

7. Plaintiffs' claims fail because Plaintiff cannot demonstrate that Intervening Defendant had the requisite intent for the claims they allege.

8. Plaintiffs suffered no damages and/or any damages suffered by Plaintiffs were a result of either Plaintiffs' own actions or the actions of third parties over whom Intervening Defendant has no control.

9. Plaintiffs have failed to mitigate their damages, if any.

10. Subject to proof through discovery, Plaintiffs' alleged damage claims are barred in whole or in part by the after-acquired evidence doctrine.

11. Plaintiffs have unreasonably failed to mitigate their alleged damages.

12. The damages requested by Plaintiffs are not recoverable, in whole or in part, as a matter of law.

13. Plaintiffs fail to state a claim for punitive damages.

14. Plaintiffs are not entitled to equitable relief as a matter of law.

15. Plaintiffs are not entitled to attorneys' fees or costs.

16. At all relevant times, Intervening Defendant acted in compliance with all applicable laws, rules, regulations, and standards.

17. Intervening Defendants at all times acted within the scope of their statutory powers and discretion.

18. Plaintiffs have failed to join indispensable, necessary, and proper parties.

19. Intervening Defendant reserves the right to supplement these Affirmative Defenses upon the completion of discovery.

BROWN & CONNERY, LLP
Attorneys for Intervenor, Camden
County Democratic Committee

Dated: March 4, 2024 BY: s/ William M. Tambussi
William M. Tambussi, Esquire
Alyssa I. Lott, Esquire

RESERVATION OF RIGHTS

Intervening Defendant hereby reserves the right prior to, at, or after trial to interpose any additional objections and/or further defenses as continuing investigation may disclose.

BROWN & CONNERY, LLP
Attorneys for Intervenor, Camden
County Democratic Committee

Dated: March 4, 2024 BY: s/ William M. Tambussi
William M. Tambussi, Esquire
Alyssa I. Lott, Esquire

JURY TRIAL DEMAND

Intervening Defendant hereby demands a trial by jury in the above-captioned matter on all claims.

BROWN & CONNERY, LLP
Attorneys for Intervenor, Camden
County Democratic Committee

Dated: March 4, 2024 BY: s/ William M. Tambussi
William M. Tambussi, Esquire
Alyssa I. Lott, Esquire

DESIGNATION OF TRIAL COUNSEL

William M. Tambussi, Esquire is hereby designated as trial counsel for Intervening Defendant in the above-captioned matter on all claims.

BROWN & CONNERY, LLP
Attorneys for Intervenor, Camden
County Democratic Committee

Dated: March 4, 2024 BY: s/ William M. Tambussi
William M. Tambussi, Esquire
Alyssa I. Lott, Esquire

CERTIFICATION PURSUANT TO LOCAL RULE 11.2

I hereby certify that the matter in controversy in this action is the subject of the following other actions pending before this Court:

Conforti, et al. v. Hanlon, et al., Civil Action No.: 3:20-cv-08264-ZNQ-TJB

Mazo v. Durkin, et al., Civil Action No.: 3:20-cv-08336-ZNQ-TJB

I further certify that there are no additional known parties who should be joined in the present action at this time.

I hereby certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I may be subject to punishment.

BROWN & CONNERY, LLP
Attorneys for Intervenor, Camden
County Democratic Committee

Dated: March 4, 2024

BY: s/ William M. Tambussi
William M. Tambussi, Esquire
Alyssa I. Lott, Esquire